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8 Attorney for Plaintiff  
9 Maureen Harrington,  
10 *as personal representative for the  
11 estate of Blaine Harrington III*

12  
13 IN THE UNITED STATES DISTRICT COURT  
14 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 MAUREEN HARRINGTON,  
16 *AS PERSONAL REPRESENTATIVE  
17 FOR THE ESTATE OF BLAINE  
HARRINGTON III,*

18 Plaintiff,

v.

19 DEEPAK DUGAR, M.D. a MEDICAL  
20 CORPORATION,

21 Defendant.

22 Civil Action No. 2:22-cv-08230-HDV-  
23 E

24  
25 **PLAINTIFF'S NOTICE OF  
26 MOTION AND MOTION TO  
27 GRANT PERMISSION TO  
28 ATTEND THE MOTION FOR  
29 ATTORNEY FEES HEARING  
30 REMOTELY**

31 DATE: August 8, 2024

32 TIME: 10:00 a.m.

33 JUDGE: Hernán D. Vera

34 CTRM: First Street Courthouse, 350 W.  
35 1st Street, Courtroom 5B, 5th Floor, Los  
36 Angeles, California 90012

1 PLEASE TAKE NOTICE that, Plaintiff/counter-defendant Maureen  
2 Harrington (“Plaintiff”), as personal representative for the estate of Blaine  
3 Harrington III (“Blaine”), hereby files this motion to request the Court to allow  
4 Plaintiff’s counsel to attend the Motion for Attorney Fees hearing remotely, and  
states as follows:

5 1. On June 13, 2024, Plaintiff filed her Motion for Attorney Fees. See  
6 D.E. 201.

7 2. Mr. DeSouza served as lead trial counsel and will likewise be the  
8 attorney taking point at the Motion for Attorney Fee hearing. Mr. DeSouza is a  
9 Florida-based attorney.

10 3. As indicated by defendant Deepak Dugar M.D., a Medical  
11 Corporation’s (“Defendant”) Memorandum in Opposition Plaintiff’s Motion for  
12 Attorney Fees [D.E. 216], the Parties disagree about fees, as well as costs.

13 4. To be mindful of the costs both sides have already incurred, and to try  
14 and minimize the further costs incurred, Plaintiff respectfully request that the Court  
15 allow Plaintiff to appear at the Motion for Attorney Fees hearing via zoom, or  
another remote method.

16 5. Undersigned counsel spoke with Jeffrey Squires, Esq., who is counsel  
17 for Defendant.

18 6. Mr. Squires indicated that he takes no position on Plaintiff’s request.

1       7. The relief requested is not made in bad faith, will not cause undue  
2 delay, nor will it prejudice either party.

3       **WHEREFORE**, Plaintiff respectfully requests that the Court enter an  
4 Order: (a) permitting Plaintiff to attend the Motion for Attorney Fees hearing via  
5 zoom; and (b) for such further relief as the Court deems proper.

6       **LOCAL RULE 7.3 CERTIFICATE**

7       Before filing this Motion, undersigned counsel conferred with counsel for  
8 Defendant (Jeffrey L. Squires, Esq.), who has taken no position on the relief  
9 requested.

10      Dated: July 25, 2024.

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19      *Attorneys for Plaintiff*

20      By: /s/ Lauren M. Hausman  
21      Lauren M. Hausman, Esq.  
22      Scott E. Radcliffe, Esq.  
23      Daniel DeSouza, Esq.

1

2 **CERTIFICATE OF SERVICE**

3

4 I hereby certify that on July 25, 2024, I electronically filed the foregoing  
5 document with the Clerk of the Court using CM/ECF, which will electronically  
6 serve all counsel of record.

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